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Note: Blue italicized text represent directions from the U.S. Dept. of Housing and Urban Development for each section of this Allocation Plan.

Participating Jurisdiction: Yuma County HOME Consortium Consortium Members: County of Yuma, Cities of Yuma,

Somerton, San Luis, and Town of Wellton

Date: May 6, 2022 (original) September 7, 2022 (first

revision)

Introduction

The American Rescue Plan (ARP) was signed into law on March 11, 2021, to provide federal funding to address the ongoing impact of the Coronavirus Pandemic on the national economy, public health, state and local governments, businesses, and citizens.

To address these needs, Congress allocated ARP funding to be administered by the U.S. Department of Housing and Urban Development (HUD) as part of the department's Home Investment Partnerships Program (HOME-ARP), to address qualifying populations below:

- Homeless (as defined in 24 CFR 91.5)
- ❖ At risk of Homelessness (as defined in 24 CFR 91.5)
- ❖ Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking as defined by HUD
- Other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a))

Allowable activities using HOME-ARP funds to address these needs include: development and support of affordable housing; tenant-based rental assistance (TBRA); supportive services; and acquisition or development of non-congregate shelter units.

HUD notified the Yuma County HOME (Consortium), through its lead entity the City of Yuma (City), that, pending an approved HOME-ARP Allocation Plan, it is allocated \$2,730,716 in HOME-ARP funding. After receiving consultation, input from stakeholders, and required statistical analysis, the City has developed this draft HOME-ARP Allocation Plan describing planned activities to address the qualifying populations (QPs) including homeless and those at risk of becoming homeless as defined in the HOME-ARP regulations.

Consultation

In accordance with Section V.A of the Notice (page 13), <u>before developing its HOME-ARP</u> <u>allocation plan</u>, at a <u>minimum</u>, a PJ must consult with:

- CoC(s) serving the jurisdiction's geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans' groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state's boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Describe the consultation process including methods used and dates of consultation: Continuum of Care Consultation: Yuma County Coalition to End Homelessness / Balance of State Continuum of Care:

The first consultation in preparation of the Consortium's HOME-ARP Allocation Plan was with the Continuum of Care (CoC).

Yuma County is a member of the Arizona Balance of State CoC. The Balance of State CoC brings together local governments, community businesses, faith-based organizations, non-profits, current and/or formerly homeless persons from the 13 non-metro counties in Arizona. The Arizona Department of Housing (ADOH) serves as the Collaborative Applicant and Homeless Management Information System (HMIS) lead agency for the CoC. ADOH then acts as the administering agency for the grants that are passed through to the participating sub-recipients.

Locally the Yuma County Coalition to End Homelessness (Coalition) is the CoC sub-agency that manages Homeless Management Information System (HMIS) and Coordinated Entry for the community. The Coalition is a community-based group responsible for the coordination, development and evaluation of housing and services for the homeless, persons at risk of homelessness, and other vulnerable populations with housing needs. A subcommittee of the Coalition engages in bi-weekly case conferencing to review HMIS information and guide service delivery to individuals in need of housing and other services in Yuma County. ACHIEVE Human Services serves as the lead agency for the Coalition and representative to the larger Balance of State CoC. ACHIEVE offers housing opportunities for individuals who are diagnosed with serious mental illness and require supported living. The CoC consultation included an in-person meeting with the ACHIEVE personnel who staff the Coalition as well as presentations at Coalition meetings.

During the consultation, Coalition members emphasized the lack of affordable rental units as a primary need in Yuma County. Voucher holders struggle to find units with rents that meet the payment standards for voucher programs. The Coalition members reported that there are several agencies that actively serve the community's homeless; however, the community needs more street outreach to inform the homeless of available services. The Coalition's case conferencing mechanism is working well, but participation in bi-monthly Coalition meetings is sometimes lacking by agencies engaged in service delivery to the QP.

The Coalition members in the CoC consultation were encouraged to take part in the Town Hall conversation, to express their perspective on the needs of the QPs in Yuma County.

Consultation with other agencies and service providers to the QP:

Consultation with staff from the Housing Authority of the City of Yuma (HACY), show that there is an increase of housing needs for people experiencing extreme financial hardship and difficulty in finding affordable housing. In addition to public housing and various housing voucher programs, HACY provides tenant-based rental assistance (TBRA) through the Consortium, funded with HOME funds, to eligible applicants. The TBRA statistics show that in program year 2021-2022, 32 families received assistance. The income level for 29, or 90%, of those receiving assistance was 0-30% AMI. Without assistance, these families were at extremely high risk of homelessness. Additionally, seven families are identified as Elderly or Disabled. HACY has seen an increase of elderly applicants due to rents being raised beyond what they can afford.

Staff at the Yuma County Housing Department, the community's only other public housing agency, was unavailable for a one-on-one consultation. The Executive Director was in attendance at the Town Hall event, however, to offer input on the housing needs of the QP in Yuma County.

Another community service provider, Catholic Community Services (CCS), offers services and rental assistance to individuals and families experiencing domestic violence. Through their HOME funded TBRA program, families are placed in safe housing and can start the process of healing. During the year that their clients receive rental assistance, the client works with case workers to obtain employment, if needed, and to become self-sufficient. Seven families received TBRA assistance for the 2021-2022 program year. All but one of the families were at 0-30% AMI and the other family was at 30-50% AMI. CCS's program is very successful, with most of the clients able to maintain residency once the TBRA assistance ends.

As is the case with the Coalition, HACY and CCS report extreme difficulty finding affordable rental units and landlords willing to accept housing or rental vouchers.

Town Hall meeting:

In order to facilitate consultation with community stakeholders with knowledge of the needs of the QP, the Consortium collaborated with the Southwest Arizona Town Hall (SWATH) to hold a virtual town hall. SWATH, a subsidiary of the larger statewide Arizona Town Hall, engages people to resolve issues through consensus, using a process based on respectful dialog that values diverse perspectives. SWATH's mission is to engage key public and private sector representatives in meaningful discussion of important regional issues resulting in specific, actionable recommendations that can be used to coordinate the development and implementation of effective action plans.

SWATH, the Consortium, and the City of Yuma Neighborhood Services (NS) staff compiled an extensive email list of agencies, organizations and service providers that serve QPs in Yuma County.

SWATH used that list to invite participation in the February 25, 2022 virtual town hall. The invitation contained the date of the town hall meeting, a description of the discussion topics, and a link for attendees to register. Completed registrations went to SWATH for compilation. As registrations started to arrive, SWATH updated the email list, identifying who registered, and regularly sent the updated list to Neighborhood Services staff for review. As the town hall date drew nearer, Neighborhood Services staff identified agencies and service providers that had not registered and started a campaign with personal invitations to attend. Neighborhood Services staff made extra effort to include the requisite agencies and service providers to ensure compliance with HOME-ARP consultation requirements and ample representation of each of the four QP. As the table below shows, the effort resulted in representation from all four QPs.

Additionally, the City of Yuma's communications team used its media and social media mechanisms to encourage attendance from the public. That effort resulted in a few citizens, not affiliated with any agency or service provider, attending the town hall meeting and actively participating in the discussions.

The Town Hall began with an opening session during which keynote speakers provided background information about HOME-ARP, the resources currently available to the QP, and the challenges of developing affordable housing. The keynote speakers included:

- Rhonda Lee-James, Assistant Director, Planning and Neighborhood Services
 Department, City of Yuma, presented an overview of the HOME-ARP Program, its
 purpose, and its requirements;
- Joanna Carr, Policy and Research Director, Arizona Housing Coalition, highlighted affordable housing issues in Yuma County including Arizona's housing landscape, Yuma's housing affordability, HOME Consortium and City of Yuma Housing Needs Assessment, impacts from COVID-19 and COVID-19 Stimulus funding; and,
- Brian Swanton, President & CEO, Gorman & Company, LLC, shared information about the development and building of affordable housing units, the complexities and competitiveness of Low Income Housing Credits, and other financing options available to developers.

Following the presentations, the attendees were delivered virtually into breakout groups. For each of the breakout groups, SWATH provided a moderator to keep the discussion on track and a recorder to capture the ideas and suggestions made by the attendees. Both breakout groups were asked the same three questions:

- 1. The HOME-ARP funds must be used to meet the needs of the "Qualifying Population" (QP) in Yuma County. The QP includes:
 - Homeless
 - At-risk of homelessness
 - Fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking
 - Other populations where assistance would prevent the family's homelessness or serve those with the greatest risk of housing instability

In Yuma County, what are the unmet needs of each group in the QP? Are there gaps in Yuma County's: a) housing and shelter inventory, b) homeless assistance and services and c) homelessness prevention service delivery systems?

- 2. Communities may use HOME-ARP funds for the following eligible activities:
 - Development of Affordable Rental Housing; acquisition, construction, or rehabilitation
 - Tenant-Based Rental Assistance; payment of rent and utilities for QP (as long as the funding lasts)
 - Supportive Services: services for people not already receiving services under another program
 - Non-congregate shelter; private units or rooms for temporary shelter

Which of these activities is most needed in Yuma County? Which activity or activities would have the biggest impact?

3. From the activities established in Question 2, which groups, if any, should receive prioritization to receive these activities?

List the organizations consulted:

Organization Represented by Town Hall Participants	Type of Organization	QP Served	Services Provided
	Public Agency Nonprofit	H = Homeless AR = At-risk of homelessness DV = Domestic and Dating Violence, Sexual Assault, Stalking, Human	
	РНА	Trafficking Other = Other Populations	
Achieve Human Services*	Private Nonprofit	Н	Homeless, Disabled
Arizona Community Foundation	Nonprofit	All	Grant resources
Arizona Department of Housing	Public Agency	All	Housing, Homeless services, Special needs
Arizona Housing Coalition	Nonprofit	All	Affordable housing advocacy
Arizona Western College	Public Agency	All	Education
Balance of State Continuum of Care (Yuma Coalition to End Homelessness)*	Nonprofit	H, AR, Other	Support services for the homeless
Benesch, Shadle, & White	Private	Н	Law firm
Campesinos Sin Fronteras	Nonprofit	AR, Other	Housing, services low-income, farm laborer
Catholic Community Services*	Nonprofit	DV	Services and shelter for DV, elderly services
City of San Luis (Consortium member)	Public Agency	All	General public services
City of Yuma (Consortium member)*	Public Agency	All	General public services, fair housing
Crossroads Mission*	Nonprofit	H, AR, Other	Shelter, meals, clothing homeless
Elected Officials - City of Yuma	Public Agency	All	General public services
Elected Officials - Yuma County	Public Agency	All	General public services

r Affordable Housing
Affordable Housing
Financial services
DV assistance
Crisis response, community support
Veterans assistance
Community activists
Housing
Meals, food, support services
Housing counseling, referral, support services
Housing, grant resources
Fair Housing and civil rights issues
Affordable housing
Medical services
Community Activist
Private citizen
News and information

Direct and personal outre agencies:	ach was conducted via phone and email to the f	ollowing organizations and
Balance of State Continuum of Care	Nonprofit, addresses needs of homeless and at-risk populations	
Community Development Block Grant Advisory Committee	Private citizens that serve on the CDBG Advisory Committee which addresses needs of all qualifying populations	
Crossroads Mission	Nonprofit, addresses needs of homeless and at-risk populations	
Housing Authority of the City of Yuma (HACY) and Yuma County Housing Department	Public, addresses housing needs of homeless and at-risk populations	
Safe House	Nonprofit, addresses needs of domestic violence survivors and elderly populations	
Yuma Private Industry Council (YPIC)	Nonprofit, addresses workforce development, career resources, and other needs of the QP	

Summarize feedback received and results of upfront consultation with these entities:

After a lively and productive discussion, both breakout groups independently concluded that the largest unmet need in Yuma is an insufficient inventory of affordable housing for QPs including low-income families, aging and elderly individuals, veterans, domestic violence survivors, individuals with mental health issues, homeless individuals and families, and migrant/agricultural workers. The lack of affordable housing inventory was a consistent theme throughout the discussions and the attendees stressed an urgency to provide more housing.

Both groups also discussed the need for support, referral, and resource services of all kinds, with specific emphasis on homelessness, mental health, migrant/agricultural workers, individuals with special needs, and specific programs for rural communities. Examples of services needed include: a "one-stop" center for individuals to get information on housing, health care, and other needs; services specific to the rural communities that may have a different set of circumstances and needs; and follow-up services to ensure individuals are improving their own circumstances or to see if more care is needed.

Attendees discussed the need for both congregate and non-congregate homeless shelters. During the discussion, one of the non-profit organizations stated that it currently has an initiative underway to build a congregate men's shelter that would potentially house up to 400 homeless men.

Considering priority populations and the need to provide preferences to certain segments of the QP, one breakout group identified the aging/elderly population as the priority, while the other breakout group identified the priority as family and non-congregate housing. Both breakout groups spoke of an increasing number of aging/elderly homeless persons in need of shelter.

Other QPs discussed included domestic violence survivors, those needing behavioral/mental health support, and single homeless or at risk of being homeless parents with children.

The discussions between the two breakout groups touched on all the QPs, with an emphasis on the aging/elderly homeless population. However, no single QP was identified as the population that should get priority or preference. The one consistent topic of discussion between both breakout groups is the severe lack of affordable housing and the need to increase the inventory of units in Yuma County.

(see Appendices 2 and 3 for complete reports from the breakout groups)

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for "reasonable notice and an opportunity to comment" for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Describe the public participation process, including information about and the dates of the public comment period and public hearings(s) held during the development of the plan:

• Date(s) of public notice: May 13, 2022 – Yuma Sun (see appendix 4)

May 13, 2022 – Bajo el Sol (in Spanish)

Public comment period:Start Date: May 13, 2022End Date: June 16, 2022

• Public Hearing: June 6, 2022

Describe the public participation process:

Notices were published in the Yuma Sun in English and in Spanish the Bajo el Sol, a weekly Spanish-only newspaper. The Public Notices provided the dates for review and comment, the Public Hearing on June 6, 2022, and the adoption of the Plan by City Council on July 20, 2022.

Spanish speaking staff was available for translation at the Public Hearing meeting. All meetings were held at a time of day that would enable working members of the public to participate.

Describe efforts to broaden public participation:

To ensure broad citizen participation, the City offered several opportunities to gather input from the general public, local governmental agencies, and nonprofit organizations including homeless providers, housing agencies, education, senior care, and other social service agencies.

As described under the "Consultation" section, City staff worked with Southwest Arizona Town Hall (SWATH) to organize a virtual town hall, which was held on February 25, 2022. The discussion focused on ways to address needs of the QPs. Nearly 80 people from organizations that serve QPs in various capacities participated in the discussion, including representatives from the homeless shelter, domestic violence shelter, several mental health agencies, the hospital, housing providers, various government agencies, general social service agencies, and elected officials.

A draft of the Allocation Plan was made available for public review and comment at various locations throughout Yuma County from May 13, 2022 through June 16, 2022. Locations included Yuma City Hall, Heritage Library, Yuma Main Library, Somerton City Hall, San Luis City Hall, and Wellton Town Hall. The draft was also available on the City's website.

Summarize the comments or recommendations received through the public participation process either in writing, or orally at a public hearing:

The lack of affordable housing inventory was a consistent theme throughout the discussions and the attendees stressed an urgency to provide more housing. See previous section, "Summary of Feedback Received for Consulted Organizations".

Summarize any comments or recommendations not accepted and state the reason why:

No public comments or recommendations received were rejected.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of <u>all four</u> of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Describe the size and demographic composition of qualifying populations within the PJs boundaries:

Homeless as defined in 24 CFR 91.5

Every year, with the exception of 2021 during the COVID-19 pandemic, the Yuma Coalition to End Homelessness conducts a Point-In-Time (PIT) count to create a census of individuals and families experiencing homelessness within Yuma County. According to the 2020 Yuma County PIT count, volunteers interviewed 91 persons experiencing homelessness. Additionally, 24 household members are included in the count. PIT count data only provides a snapshot of the current state of homelessness within the community on a given date.

Although the most current 2022 PIT count data for Yuma County is not available because it is not separated out from the Balance of State as a whole, Achieve Human Services reports that 107 persons experienced homelessness on the date of the PIT count.

The data in the following tables provide an overview of the number of persons experiencing homelessness on a given night in the County of Yuma. The tables provide a breakdown in demographics by race, ethnicity, age, and those persons requiring services.

Homeless Needs Assessment							
Demographic Summary of Homeless by Race							
	Persons	Additonal HH					
	interviewed	Members	Total	% of Total			
White	65	11	76	66.09%			
African American	3	2	5	4.35%			
Asian	0	0	0	0.00%			
Hawaiian	0	0	0	0.00%			
Native American	4	8	12	10.43%			
Multiple Races	19	3	22	19.13%			
Total	91	24	115	100.00%			
Source: Vuma County Boi	int in Time Count 2020						

Source: Yuma County Point in Time Count - 2020

Homeless Needs Assessment Demographic Summary of Homeless by Ethnicity						
	Persons	Additional HH				
Population	interviewed	Members	Total	% of Total		
Mexican/Latino/Hispanic	27	1	28	24.00%		

Source: Yuma County Point in Time Count - 2020

The PIT Count data above reveals that 66.09% of persons experiencing homelessness are White, 4.35% are African American, 10.43% are Native American, and 19.13% are multiple races. Twenty-four percent are of Mexican/Latino/Hispanic ethnicity.

	Homeless Ne	eds Assessme	nt				
Demographic Summary of Homeless by Age							
	Person	Additional HH					
Population	interviewed	Members	Total	% of Total			
Children under age 18	0	1	1	0.87%			
Persons age 18 to 24	5	3	8	6.96%			
Persons age 25 to 34	10	7	17	14.78%			
Persons age 35 to 44	15	3	18	15.65%			
Persons age 45 to 54	16	7	23	20.00%			
Persons age 55 to 64	35	3	38	33.04%			
Persons age 65 to 74	9	0	9	7.83%			
Persons over age 75	1	0	1	0.87%			
Total	91	24	115	100.00%			
Source: Yuma County Point	in Time Count - 2020						

The table above shows that persons in the age range of 45 years to 64 years represent the highest percentage, over 53%, of persons experiencing homelessness. The second highest age group experiencing homelessness are those aged between 25 years and 44 years at over 30%. The data quantifies an observation of participants at the Town Hall consultation that the homeless in Yuma County are aging and requiring medical services.

At Risk of Homelessness as defined in 24 CFR 91.5

Persons who are at most risk of experiencing homelessness include individuals and families who have an annual income below 30% of the area median family income (AMI), do not have sufficient resources or support networks available to prevent them from moving to a shelter, or meets one of several other conditions outlined at 24 CFR 91.5. Among those other conditions are living in the home of another, living in overcrowded conditions, or living in housing that has characteristics that are associated with instability.

According to the U.S. Census, as of 2019, there were 18,469 residents living below the poverty level in the city of Yuma and 44,400 in Yuma County. The poverty rate was 19.6 percent for the city and 21.4 percent for the county. This is considerably higher than the US poverty rate of 12.3 percent, and the State of Arizona poverty rate of 13.5 percent.

The Yuma County Housing Market Assessment of 2021 revealed that one third of renters (about 7,740 households) living in Yuma County earn less than \$20,000 per year. Further, that Assessment investigated overcrowding and substandard units. This study uses HUD's definition of having more than one person per room to identify overcrowded units and more than 1.5 persons per room to identify severely overcrowded units. Seven percent of the Yuma's households—or about 2,400 households—are overcrowded.

According to the Consolidated Plan, most of Yuma County's lowest income households are small family households and nearly one-fourth (23%) contain young children. In addition, the County has 6,995 extremely low income families (<30 % AMI) with a housing problem.

The chart below shows the Housing Problems of owners and renters that could indicate risk of homelessness as defined at 24 CFR 91.5.

Housing Problems

		Renter					Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLD	S	•		•		•				•
Substandard Housing – Lacking complete plumbing or kitchen facilities	175	35	25	10	245	15	110	20	50	195
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	145	190	85	90	510	30	20	245	85	380
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	275	215	280	200	970	150	195	570	90	1,005
Housing cost burden greater than 50% of income (and none of the above problems)	2,030	1,500	525	25	4,080	1,520	930	905	160	3,515
Housing cost burden greater than 30% of income (and none of the above problems)	290	995	1,750	470	3,505	375	1,095	2,030	940	4,440
Zero/negative Income (and none of the above problems)	965	920	1,745	1,345	4,975	1,030	1,540	4,090	3,130	9,790

Data Source: 2013-2017 CHAS

Note: The CHAS data taken from the Consolidated Plan was the most recent data available at its writing. There is no substantive change in CHAS data between 2017 and 2018.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

The Consolidated Plan states that National incidence rates indicate that 37 percent of women and 34 percent of men aged 18 or older have experienced contact sexual violence, physical violence, or stalking by an intimate partner in their lifetime. Annual incidence rates—meaning the proportion of people who have experienced contact sexual violence, physical violence, or stalking by an intimate partner in the previous year—are 5.5 percent for women and 5.2 percent for men.

Applying these rates to the Yuma County population of women and men over 18 indicates that 8,351 residents are likely to have experienced some type of domestic violence, dating violence, sexual assault and/or stalking by an intimate partner in the previous year. National statistics show that 3.6 percent of women and 1.0 percent of men experiencing intimate partner violence are in need of housing services. In Yuma County, these statistics suggest that 191 victims of domestic violence, or 2 percent, require housing services each year. The 2020 PIT Count shows that 29.67% of those experiencing homelessness were victims of domestic violence.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

The Notice identifies several factors to define the fourth QP – Other Populations. HUD defines these populations as individuals and households who do not qualify under any of the previous three QPs but meet additional criteria including,

- requiring services or assistance to prevent homelessness,
- at greatest risk of housing instability because of income at less than 30% of AMI and are experiencing severe housing cost burden;
- has an income at less than 50 % of AMI with one of numerous other contributing factors
- veterans with one of the contributing factors identified at this section of the notice.

The most common definition of housing affordability is linked to the idea that households should not be cost burdened by housing. A cost burdened household is one in which housing costs—the rent or mortgage payment, plus taxes and utilities—consumes more than 30 percent of monthly gross income. Housing costs are considered affordable if they do not exceed 30% of the household's gross monthly income, while households paying more than 50% of income for housing are considered severely cost burdened.

According to the Housing Problems Table shown above, among extremely low-income households, the most common housing problem for renters is severe cost burden (2,030 renters). Further analysis of Cost Burden data, as found in the two charts below, shows there are 2,485 extremely low-income renter households with severe housing cost burden, a significant proportion of which are small related households.

Cost Burden > 30%

	Renter	Renter				Owner		
	0-30%	>30-50%	>50-80%	Total	0-30%	>30-50%	>50-80%	Total
	AMI	AMI	AMI		AMI	AMI	AMI	
NUMBER OF HOUSEHOLD	S							
Small Related	135	495	1,190	1,820	65	365	1,060	1,490
Large Related	4	150	205	359	10	180	515	705
Elderly	104	290	200	594	260	535	575	1,370
Other	85	220	365	670	60	100	120	280
Total need by income	328	1,155	1,960	3,443	395	1,180	2,270	3,845

Data Source: 2013-2017 CHAS

Cost Burden > 50%

	Renter				Owner	Owner		
	0-30%	>30-	>50-	Total	0-30%	>30-	>50-	Total
	AMI	50%	80%		AMI	50%	80%	
		AMI	AMI			AMI	AMI	
NUMBER OF HOUSEHOLDS								
Small Related	1,405	875	230	2,510	540	335	360	1,235
Large Related	375	245	120	740	220	105	40	365
Elderly	290	260	115	665	690	345	390	1,425
Other	415	310	70	795	230	215	125	570
Total need by income	2,485	1,690	535	4,710	1,680	1,000	915	3,595

Data Source: 2013-2017 CHAS

Note: The CHAS data taken from the Consolidated Plan was the most recent data available at its writing. There is no substantive change in CHAS data between 2017 and 2018.

PIT count data shows, of the homeless in Yuma County in 2020: 14.29% are veterans, 29.67% are survivors of domestic violence, 25.27% have a physical disability, 43.96% have a chronic health condition/physical injury/disease, 29.67% have a substance use disorder, and 40.66% have mental health conditions or brain injuries.

Homeless Needs Assessment Summary of All Other Populations Reported							
	# of persons		% of total				
Population	reported		persons				
Veterans	13		14.29%				
Persons with Mental							
Illness/Traumatic Brain Injury	37		40.66%				
Persons with HIV	2		2.20%				
Persons with Substance							
Abuse	27		29.67%				
DV Survivor	27		29.67%				
Chronically Homeless							
Individuals	70		76.92%				
Persons with a Chronic Health							
Condition/Physical							
Injury/Disease	38		41.76%				
Persons with Physical							
Disability	23		25.27%				
Source: Yuma County Point in Time Count - 2020							

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent support rental housing:

Emergency Shelter (Congregate and Non-Congregate):

There is currently only one homeless shelter in Yuma County. The shelter has a long history of serving the Yuma community. The Lower Lights Rescue Mission opened in 1959. In 1994, the name changed to Crossroads Mission after opening the new shelter at 944 S. Arizona Avenue. The director at that time realized that the new shelter was too small to house men and families and rented a house four blocks away. Families and single women were housed there until 2011, when the current Family Shelter opened.

Over the years, as the community needs increased, more programs were developed. The first program developed was the substance abuse program and then later, in 2008, a 16-bed detox center opened. Next, the thrift store, which supports the homeless and other programs, opened at 550 W. 8th Street. Additionally, for several years the shelter's kitchen served over 120,000 meals a year. These meals were available to the homeless, people in the shelter's programs, and people from the community who were having a difficult time making ends meet. Crossroads Mission works with multiple agencies to find housing and other much-needed resources. Over the years, the education department has supported education for the homeless, the people in the programs, and people from the community who are seeking to earn a GED or advance to the local community college. As times have changed, the Mission has evolved to meet community needs.

Currently, Crossroads has a Men's Shelter (18+ years of age) with 82 beds with 50 overflow beds totaling 132 beds, a Family Shelter that houses families, married couples, and single women with 100 beds with 57 overflow totaling 157, and a Detox section that houses 11 men and 5 women who are trying to stabilize from drugs or alcohol. An effort is underway to raise funds for a new Men's Center.

In 2020, Crossroads Mission served 588 adults and 177 children totaling 765 persons. In 2021, those numbers increased to 814 adults and 182 children totaling 996 persons – an increase of 23%.

Domestic Violence Shelter:

Catholic Community Services Yuma Safe House Shelter (Safe House) has a mission to strengthen children, adults, families and communities by providing help, creating hope, and serving all. The Safe House strives to help adults and families regain control and transform their lives, breaking the cycle of violence. For over 38 years, Safe House has served as the only domestic violence shelter in Yuma County providing critical emergency shelter for up to 120 days for survivors and their children, who have been impacted by domestic violence, sexual assault, dating violence, and stalking. These services, along with their mobile and community-based outreach programs, support the mission of ending the epidemic of domestic violence.

Yuma, Arizona is a rural community that borders Mexico and California. As such, the Safe House is the only shelter available within hundreds of miles for those fleeing from desperate and violent situations. Safe House has provided care and support to those most vulnerable and in need, not only addressing their immediate survival but in helping them get back on their feet, regain control, and get their lives back. Safe House has assisted in the transformation of families that they have served; some have been able to participate in a tenant-based housing program, which contributes to confidence building and the courage to persevere.

Safe House is an up to 40-bed facility, emergency domestic violence shelter. However, during the COVID-19 pandemic it served fewer clients and children due to social distancing recommended by the CDC.

Safe House measures capacity of the emergency shelter by the term "bed nights" In FY 20-21 Safe House served 4,660 bed nights, 103 children and 112 adults. To date in FY 21-22, the Shelter has served 4,774 bed nights, 106 children and 89 adults. During the first part of FY21-22, there has been a nearly 2% increase in bed nights served.

Tenant-based Rental Assistance:

The Consortium collaborates with the Housing Authority of the City of Yuma (HACY) to administer a Tenant-based Rental Assistance (TBRA) program. To date, HACY has assisted 42 families with rental assistance.

Additionally, Safe House receives HOME funds to help survivors of domestic violence obtain housing once their stay at the shelter is exhausted. To date, 29 families have been assisted by their TBRA program.

During their 12 months of TBRA assistance, case workers make monthly visits and provide supportive services as needed.

Supportive Services:

In addition to the previously described services available in Yuma County, the table below identifies additional service providers that offer services to Qualifying Populations.

	County of Yuma
	Resources available to assist Qualifying Populations
Organization	Service Provided
Amberly's Place Family Advocacy Center	Assists victims of domestic violence, child abuse, sexual assault, and elder abuse
ACHIEVE Human Services Inc.	Vocational rehabilitation, center-based employment, housing services, adult day program, Title VI
Healing Journey, Inc.	Individual, family, and group therapy, life skills, and children's group
Right Turn for Yuma Veterans	Provide homeless or at risk veterans with permanent transition from homelessness to financial and
	social independence
Saguaro Foundation Community Home	Family child care, migrant and seasonal Head Start programs, services for individuals with
Program	developmental disabilities, the behavioral health community, and transportation services,
	grouphomes, day programs, respite services
The Salvation Army	Meet human need without discrimination
San Luis Food Pantry	Serving the nutritional needs of individuals and families
San Luis Senior Nutrition	Serving the nutritional needs of seniors
WACOG - Community Action Programs	Helping individuals in economic crisis to strengthen their families and communities
Yuma Community Food Bank	Food assistance for low-income individuals and families

Describe the unmet housing and service needs of qualifying populations:

The Consolidated Plan examines housing, community, and economic development needs of residents. The 2021-2025 Five-year Consolidated Plan's Goal #1 is to increase affordable rental housing options through the creation of new units and tenant-based rental assistance.

As part of its Housing Needs Assessment, the Plan reports on Yuma County's housing needs. Top housing needs county-wide include affordable rental housing (including housing for those transitioning out of homelessness as well as workforce housing), accessible housing for people with disabilities, and entry-level ownership opportunities for low and moderate-income residents who would like to buy homes. Cost burden and severe cost burden are the most common housing problems in the county. Condition issues and crowding are also problems experienced by low-income households.

The table below shows existing and projected housing needs for special populations in Yuma County. Existing needs are based on HUD's "CHAS" data (Comprehensive Housing Affordability Strategy) which identifies housing problems of the population overall and of special populations.

		Current Ho		Projected Housing	
	Total Households	Number	Percent	Number	Housing needs description
Extremely low income families	6,995	5,005	72%	5,443	<30% AMI households with a housing problem
Low income families	7,745	5,285	68%	5,747	30-50% AMI households with a housing problem
Moderate income families	12,270	6,430	52%	6,992	50-80% AMI households with a housing problem
Middle income families	6,600	2,125	32%	2,311	80-100% AMI households with a housing problem
Rent ers	23,290	10,335	44%	11,238	Renters with 1 or more housing problems
Owners	48,380	12,815	26%	13,935	Owners with 1 or more housing problems
Elderly Households	27,840	7,105	26%	7,726	Elderly households (member 62+) that are cost burdened
Single person households	15,351	2,711	18%	2,948	Single person households living in poverty
Large families	10,700	5,130	48%	5,578	Large families that are cost burdened
LEP households	7,321	1,387	19%	1,508	Limited English Proficiency Households in poverty
Households containing persons with disability	18,455	6,486	35%	7,053	Households with at least one member with a disability and or more housing problems
Hearing or vision impairment	8,675	2,490	29%	2,708	Hearing or vision impairment and 1 or more housing problems
Ambulatory limitation	11,285	4,030	36%	4,382	Ambulatory limitation and 1 or more housing problems
Cognitive limitation	5,925	2,465	42%	2,680	Cognitive limitation and 1 or more housing problems
Self-care or independent living limitation	6,680	2,460	37%	2,675	Self-care or independent living limitation and 1 or more housing problems
Victims of domestic violence	8,351	191	2%	208	Applies CDC estimate of % of victims annually with housing needs

Note: Needs are not additive as a single household may appear in more than one category. Five-year projections apply compound annual population growth to current estimates.

Source: 2011-2015 HUD Comprehensive Housing Affordability Strategy data, and City of Yuma 2021-2025 Consolidated Plan and 2021 Action Plan

Homeless as defined in 24 CFR 91.5

Crossroads Mission is the only shelter serving the County's homeless population. It has a 132-bed men's shelter, 157-bed family shelter, and 16-bed detox center. In 2020, the shelter served 588 individuals and 177 children and in 2021, it served 814 individuals and 182 children. The difference between the two years represents an increase of 38% of individuals and a slight increase of nearly 3% of children served. 2020 PIT Count data may not be reflective of actual shelter needs because COVID-19 discouraged homeless individuals from seeking shelter in the congregate setting.

An effort is currently underway to raise funds for a new men's shelter. The new shelter is anticipated to provide an additional 400 beds.

At Risk of Homelessness as defined in 24 CFR 91.5

In preparation of the Consolidated Plan, Root Policy Research conducted an analysis of both Yuma County and the City of Yuma, comparing the supply of housing at various price points to the number of households who can afford such housing.

As detailed in the "Identify any gaps within the current shelter and housing inventory as well as the service delivery system" section below, analyses for both Yuma County and the City of Yuma show that one third of renters (about 7,740 households) living in the County and (about 4,400 in the City) earn less than \$20,000 per year and need rental units of \$500/month and less. These renters need units that cost less than \$500 per month to avoid being cost burdened, however, just 15 percent of County rental units (4,000 units) and 12 percent in the City, rent for less than \$500/month. This leaves a "gap," or shortage, of 14,186 units for these low-income households.

Yuma County, 2019							
Maximum Rental Demand Rental Supply							
	Affordable	(Current Renters) (Current Units)				Gap	
Renter Incomes	Gross Rent	Number	Percent	Number	Percent		
<\$5,000	\$125	2,182	9%	0	0	(2,182)	
\$5,000 - \$9,999	\$250	1,860	7%	974	4%	(886)	
\$10,000 - \$14,999	\$375	2,122	9%	1,362	5%	(760)	
\$15,000 - \$19,000	\$500	1,576	6%	1,671	6%	95	

City of Yuma, 2019								
	City	or Yuma,	2019					
	Maximum Rental Demand Rental Supply							
	Affordable	(Current	Renters)	(Curren	(Current Units)			
Renter Incomes	Gross Rent	Number	Percent	Number	Percent			
<\$5,000	\$125	1,713	12%	10	0%	(1,703)		
\$5,000 - \$9,999	\$250	838	6%	489	3%	(349)		
\$10,000 - \$14,999	\$375	1,091	8%	503	3%	(588)		
\$15,000 - \$19,000	\$500	833	6%	761	5%	(72)		

Note: Low Income Gap refers to the total gap for household with incomes below \$20,000

Source: 2019 1-year and 5-year ACS and Root Policy Research

It is important to note that renters in the income brackets where gaps exist are not homeless. Those renters who cannot find affordably priced rentals are living in units that cost more than they can afford. These households are "cost burdened." They are working residents earning low wages, residents who are unemployed, and residents who are disabled and cannot work.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Catholic Community Services Yuma Safe House Shelter (Safe House) assists persons fleeing domestic violence situations. Safe House is an up to 40-bed facility, emergency domestic violence shelter. Safe House measures capacity of the emergency shelter by the term "bed nights".

For FY 20-21 Safe House provided 4,660 bed nights, 103 children unduplicated and 112 adults unduplicated. So far, in FY 21-22, Safe House has served 4,774 bed nights, unduplicated 106 children and 89 adults unduplicated.

Although the supportive and housing services needed by intimate partner violence (IPV) victims vary, generally, all need health care and counseling immediately following the event and continued mental health support to assist with the traumatic stress disorder related to the event. Victims may also require assistance with substance abuse and mental health services, both of which are common among IPV victims. Affordable housing is also critical. The National Alliance to End Homelessness argues that a "strong investment in housing is crucial [to victims of domestic violence] ... so that the family or woman is able to leave the shelter system as quickly as possible without returning to the abuse." The Alliance also reports that studies on homelessness have shown a correlation between domestic violence and homelessness (http://www.endhomelessness.org/pages/domestic_violence).

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

The HOME-ARP notice defines "Other Populations At Greatest Risk of Housing Instability" two ways. First is that the person "has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing cost burden (i.e. is paying more than 50% of monthly household income toward housing costs)."

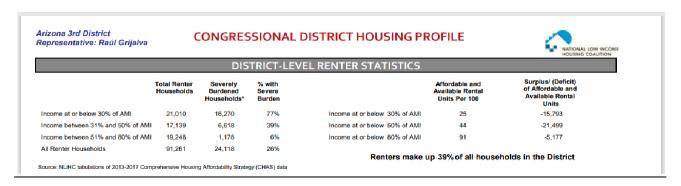
Second is that the household has an annual income that is less than or equal to 50% of the area median income, as determined by HUD, and meets one or more of the conditions of "At risk of homelessness."

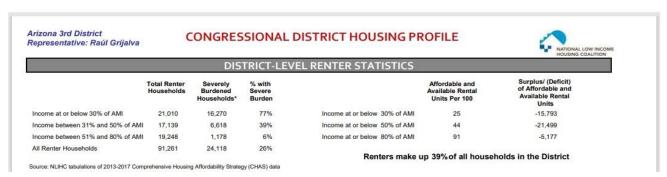
The analyses on pages 14 and 16 concerning Housing Problems and Housing Cost Burden also includes other populations requiring services or housing assistance.

Yuma County lies in two Arizona congressional districts – Raul Grijalva (District 3) and Paul Gosar (District 4).

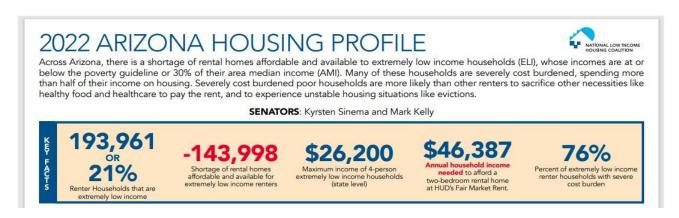
Recently released data from the National Low Income Housing Coalition (NLIHC) shows that District 3 has 91,261 renters. Of that total, (1) 23% households have income at or below 30% Area Median Income (AMI), and of those households, 77% are experiencing severe housing cost burden, (2) 19% households earn 31% - 50% AMI and 39% have severe housing cost burden and, (3) 21% households earn 51% - 80% AMI and 6% have severe housing cost burden.

Data for District 4 shows 80,926 renters. Of that total, (1) 16% households have income at or below 30% AMI, with 75% of households experiencing severe cost burden, (2) 16% households earn 31% - 50% AMI and 43% have severe cost burden and, (3) 21% households earn 51% - 80% AMI and 10% have severe cost burden.





NLIHC also reports that Statewide, 21% of renter households are extremely low income and 76% of those households experience severe cost burden. The data for Yuma County reflects consistency with what the state is experiencing with housing instability.



Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

Yuma County has two organizations that provide congregate shelter. Crossroads Mission provides shelter for the homeless and Catholic Community Services' Safe House provides shelter for victims of domestic violence. They both occasionally reach maximum capacity. Currently, Safe House has no choice but to turn people away when they reach capacity. However, Safe House is in the process of constructing two additional rooms, two new bathrooms, and a group room. When Crossroads Mission runs out of beds, they do not turn people away. Instead, they provide sleeping mats and blankets for people to use in other areas of the facility. Crossroads Mission is currently running a capital campaign to raise funds for their new congregate men's shelter that will make more beds available.

To examine how Yuma County's current housing market meets the needs of its residents Root Policy Research, in preparation of the Consolidated Plan, conducted an analysis comparing the supply of housing at various price points to the number of households who can afford such housing. If there are more housing units than households, the market is "oversupplying" housing at that price range. Conversely, if there are too few units, the market is "undersupplying" housing. This analysis addresses both rental affordability and ownership opportunities for renters who want to buy.

The table below compares the number of renter households in the County in 2019, income levels, the maximum monthly rent they could afford without being cost burdened, and the number of units in the market that were affordable to them. The "Gap" column shows the difference between the number of renter households and the number of affordable rental units. Negative numbers indicate a shortage of units at the specific income level; positive units indicate an excess of units.

The analysis shows that one third of renters (about 7,740 households) living in the County earn less than \$20,000 per year and need rental units of \$500/month and less to avoid being cost burdened. However, just 15 percent of rental units (4,000 units) rent for less than \$500/month. This leaves a "gap," or shortage, of 3,734 units for these low-income households.

Most rental units in Yuma County rent for between \$875 and \$1,875 per month—nearly 60 percent of rental units fall within this range. There are approximately 7,500 households that can afford rents in this range and over 16,000 units are priced appropriately, leaving a surplus of 8,500 units.

The "shortage" shown for higher income renters (earning more than \$50,000 per year) suggests those renters are spending less than 30 percent of their income on housing.

Mismatch in Rental Market, Yuma County, 2019

	Maximum Affordable	Rental Demand (Current Renters)		Rental (Current		
RenterIncomes	Gross Rent	Number	Percent	Number	Percent	Gap
Less than \$5,000	\$125	2,182	9%	0	0%	(2,182)
\$5,000 to \$9,999	\$250	1,860	7%	974	4%	(886)
\$10,000 to \$14,999	\$375	2,122	9%	1,362	5%	(760)
\$15,000 to \$19,999	\$500	1,576	6%	1,671	6%	95
\$20,000 to \$24,999	\$625	1,329	5%	2,720	10%	1,391
\$25,000 to \$34,999	\$875	4,040	16%	7,631	29%	3,591
\$35,000 to \$49,999	\$1,250	3,442	14%	8,520	32%	5,078
\$50,000 to \$74,999	\$1,875	3,658	15%	2,886	11%	(772)
\$75,000 to \$99,999	\$2,500	3,672	15%	523	2%	(3,149)
\$100,000 to \$149,99	9 \$3,750	1,027	4%	0	0%	(1,027)
\$150,000+	\$3750+	35	0%	0	0%	(35)
Total/Low Income G	ар	24,943	100%	26,286	100%	(3,734)

Note: Low Income Cap refers to the total gap for households with income below \$20,000.

Source: 2019 1-year ACS, and Root Policy Research.

The same analysis was conducted for the City of Yuma. The analysis in the following table shows that one third of renters (about 4,400 households) earn less than \$20,000 per year. These renters need units that cost less than \$500 per month to avoid being cost burdened. Just 12 percent of rental units (1,700 units) in the City rent for less than \$500/month. This leaves a "gap," or shortage, of 2,712 units for these low-income households.

Similar to the County, the market is oversupplying units in the \$875 to \$1,875/month rent range. There are fewer than 5,000 renters who can afford rents priced in this range compared to a supply of nearly 9,500 units, leaving a surplus of around 4,500 units.

It is important to note that renters in the income brackets where gaps exist are not homeless. Those renters who cannot find affordably priced rentals are living in units that cost more than they can afford. These households are either cost burdened or severely cost burdened. These households are working residents earning low wages, residents who are unemployed and residents who are disabled and cannot work.

Mismatch in Rental Market, City of Yuma, 2019

	Maximum Affordable	Rental Demand (Current Renters)		Rental (Current			
RenterIncomes	Gross Rent	Number	Percent	Number	Percent	Gap	
Lessthan\$5,000	\$125	1,713	12%	10	0%	(1,703)	
\$5,000 to \$9,999	\$250	838	6%	489	3%	(349)	
\$10,000 to \$14,999	\$375	1,091	8%	503	3%	(588)	
\$15,000 to \$19,999	\$500	833	6%	761	5%	(72)	
\$20,000 to \$24,999	\$625	500	4%	1,100	8%	600	
\$25,000 to \$34,999	\$875	2,416	18%	4,114	29%	1,698	
\$35,000 to \$49,999	\$1,250	2,357	17%	5,308	37%	2,951	
\$50,000 to \$74,999	\$1,875	1,717	12%	1,752	12%	35	
\$75,000 to \$99,999	\$2,500	1,645	12%	367	3%	(1,278)	
\$100,000 to \$149,99	9 \$3,750	637	5%	6	0%	(631)	
\$150,000÷	\$3750+	35	0%	0	0%	(35)	
Total/Low Income G	ap	13,782	100%	14,411	100%	(2,712)	

Note: Low Income Cap refers to the total gap for households with income below \$20,000.

Source: 2019 1-year and 5-year ACS, and Root Policy Research.

The table below shows rental gaps for the County in both 2010 and 2019 to evaluate changes in market trends and needs. Rental gaps significantly changed during these 9 years. In 2010 there was a 2,856 unit shortage for households earning less than \$20,000. In 2019, this gap increased to 3,734 units.

This increase was due to units that had been priced below \$500 sliding over into higher price brackets combined with an increase in households earning less than \$5,000.

The Consolidated Plan reports rental gaps in both 2010 and 2019 for the City of Yuma. In 2010 there was a 614 unit shortage for households earning less than \$20,000, and the shortage was concentrated among households earning less than \$10,000. In 2019, this gap increased to 2,712 and expanded to include households earning more than \$10,000. This increase was due to units that had been priced between \$375 and \$500 sliding over into higher price brackets combined with an increase in households earning less than \$15,000.

Gaps in Rental Market, Yuma County, 2010 and 2019

				2010			2019						
	Maximum Affordable	Rental I (Current l		Rental (Current	Supply t Units)			Demand Renters)		Supply t Units)		2010-201	9 Change
RenterIncomes	Gross Rent	Number	Percent	Number	Percent	Gap	Number	Percent	Number	Percent	Gap	Renters	Units
Less than \$5,000	\$125	991	5%	245	1%	(746)	2,182	9%	0	0%	(2,182)	1,191	(245)
\$5,000 to \$9,999	\$250	1,931	10%	648	3%	(1,283)	1,860	7%	974	4%	(886)	(71)	326
\$10,000 to \$14,999	\$375	1,366	7%	760	4%	(606)	2,122	9%	1,362	5%	(760)	756	601
\$15,000 to \$19,999	\$500	2,325	12%	2,104	10%	(221)	1,576	6%	1,671	6%	95	(749)	(433)
\$20,000 to \$24,999	\$625	2,021	11%	3,759	18%	1,738	1,329	5%	2,720	10%	1,391	(692)	(1,039)
\$25,000 to \$34,999	\$875	3,604	19%	4,437	21%	833	4,040	16%	7,631	29%	3,591	436	3,195
\$35,000 to \$49,999	\$1,250	2,787	15%	6,636	31%	3,849	3,442	14%	8,520	32%	5,078	655	1,884
\$50,000 to \$74,999	\$1,875	2,535	13%	2,057	10%	(478)	3,658	15%	2,886	11%	(772)	1,123	829
\$75,000 to \$99,999	\$2,500	948	5%	590	3%	(358)	3,672	15%	523	2%	(3,149)	2,724	(67)
\$100,000 to \$149,99	9 \$3,750	477	3%	1,590	7%	1,113	1,027	4%	0	0%	(1,027)	550	(1,590)
\$150,000+	\$3750+	46	0%	0	0%	(46)	35	0%	0	0%	(35)	(11)	0
Total/Low Income G	iap	19,031	100%	21,236	100%	(2,856)	24,943	100%	26,286	100%	(3,734)	5,912	5,050

Note: Low Income Cap refers to the total gap for households with income below \$20,000.

Source: 2010 and 2019 1-year ACS, and Root Policy Research.

Additionally, referencing the recently released data from the National Low Income Housing Coalition (NLIHC) previously reported, there is a clear affordable housing deficit in the County.

To meet affordable housing demands in Congressional District 3, for households earning at or below 30% AMI, an additional 15,793 units are needed. For households at or below 50% AMI, 21,499 are needed, and for households at or below 80% AMI, 5,177 are needed.

Congressional District 4 affordable housing demands are similar. For households earning at or below 30% AMI, 9,805 units are needed. For households at or below 50% AMI, 13,980 are needed, and for households at or below 80% AMI, 4,882 are needed.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Not applicable. The Consortium does not plan to include additional characteristics beyond those identified in the notice to further refine the definition of "other populations."

Identify priority needs for qualifying populations:

The 2021-25 Consolidated Plan identified seven key goals. The HOME-ARP funds will address Goal #1: Increase supply of affordable rental housing options through the creation of new units.

Throughout the consultation process – interviews with individual stakeholders and agencies, the Town Hall, and the public comment period – those knowledgeable about the needs of the QP in the community repeatedly said the lack of affordable rental units was the number one need of the QP. Data gathered and analyzed during the development of this Plan further emphasized the need to address Consolidated Plan Goal #1.

Specifically, the priority need of each of Qualifying Populations is rental units available at an affordable price point:

- The homeless, as defined in 24 CFR 91.5 are unable to find units affordable at rents at their income levels of <30% AMI
- Those at risk of homelessness as defined at 24 CFR 91.5 are unable to find units to rent at price points affordable at their income levels without imposing significant Housing Cost Burden
- Those fleeing domestic and other types of violence as defined in the notice are unable to find available units to rent in which they can find safe refuge from their abuse
- Other populations as defined by HUD in the Notice who lack housing opportunities because of the insufficient supply of affordable rental units in the community.

In conclusion, the priority need of all four QPs is increasing the supply of affordable rental units.

Explain how the level of need and gaps in its shelter and housing inventory and service delivery system based on the data presented in the plan were determined:

The needs and gaps analysis was developed using data from the 2020 Yuma County Point-In-Time Count, the Consolidated Plan, the City of Yuma Housing Market Assessment, and the National Low Income Housing Coalition's 2022 Arizona Housing Profile and Congressional District Housing Profiles.

Additionally, valuable information was gathered from agencies that the Consortium collaborates with to provide services to the County's qualifying population. The Consortium also gathered information from all of the stakeholders that participated in the virtual Town Hall.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

Upon approval of this allocation plan by the U.S. Department of Housing and Urban Development (HUD), the City of Yuma Neighborhood Services Division will issue a Request for Qualifications (RFQ) or initiate an application process. The RFQ or application will invite all interested housing developers, both non-profit and for-profit, to submit proposals for development of rental housing units for the Qualifying Population. A review and selection committee will evaluate the submittals and award development funding to proposal(s) that best address the housing needs identified in this Plan and best serves the Qualifying Population.

Describe whether the PJ will administer eligible activities directly:

The Consortium will not directly administer any eligible activities.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Not applicable. No portion of the HOME-ARP administrative funds were provided to a subrecipient or contractor prior to the submission or acceptance of the HOME-ARP allocation plan.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. .

The following table shows that the all HOME-ARP funding, will be utilized for the development of affordable rental housing

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	0.00		
Acquisition and Development of Non-Congregate Shelters	0.00		
Tenant-based Rental Assistance (TBRA)	0.00		
Development of Affordable Rental Housing	2,321,109		
Non-Profit Operating	0.00	0%	5%
Non-Profit Capacity Building	0.00	0%	5%
Administration and Planning	409,607	15%	15%
Total HOME-ARP Allocation	2,730,716		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

HOME-ARP funds will be used exclusively for the development of affordable rental housing.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The stakeholders who were consulted during preparation of this plan repeatedly emphasized the community's extreme shortage of rental units at affordable price points. This gap was also identified by the Consolidated Plan, the Yuma County Housing Market Assessment, and additional data gathered in preparation of this Allocation Plan. While the consultation process pointed to the value of wrap-around services for the Qualifying Population, providing stable, affordable, permanent housing was overwhelmingly presented as a first step toward self-sufficiency.

Given the level of funding made available to Yuma County from HOME-ARP, focusing resources entirely on production of affordable units is the best approach.

HOME ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The number of affordable rental housing units for the qualifying population that will be produced with the HOME-ARP allocation will be determined by the proposals received from the planned RFQ/NOFA process. If the development proposals rely exclusively on HOME-ARP funding as the source of revenue, then it is estimated that 12 units can be produced (dependent on construction market conditions at the time of production). The Consortium expects, however, that the process will attract development proposals that will braid multiple revenue sources, thereby producing a more significant number of units. For example, if Low Income Housing Tax Credits (LITHC) or the new Arizona State Affordable Housing Tax Credits can be utilized in concert with HOME-ARP, 81 units may be produced.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:

In the chart below, two scenarios are presented for estimating the production goals for the HOME-ARP allocation. With current housing market conditions, this chart estimated building costs at \$240 per square foot. In scenario #1, small units, for singles or couples, of approximately 800 square feet are projected. In scenario #2, a mixture of 1, 2, and 3 bedroom units (average 1,000 square feet per unit) would be developed to serve singles, couples and/or families.

If the HOME-ARP funds are the sole revenue source, only small units for singles or couples will be constructed in order to maximize the number of units produced. If additional funding is attracted, a mix of 1, 2 and 3 bedroom units will be produced to serve a wider demographic, as identified in the gap analysis.

Determining Housing Production Goals for the HOME-	ARP A	llocation Plan		
	HOME-ARP Rental Housing Scenerio #1		HOME-ARP Rental Housing Scenario #2	
Housing characteristics required by the qualifying populations				
Qualifying populations targeted for HOME-ARP rental housing (average household size)	Single	es/couples	Famil	ies/singles
Average household size	2		3	
Unit size needed (number of bedrooms)	1		mix 1	, 2 and 3
Amenities				
HOME-ARP Funding				
Total amount of HOME-ARP funding allocated to jurisdiction	\$	2,730,716.00	\$	2,730,716.00
Amount of HOME-ARP expected to be used for admin, NFP operating and capacity building	\$	409,607.00	\$	409,607.00
Amount of HOME-ARP available for HOME-ARP eligible activities	\$	2,321,109.00	\$	2,321,109.00
Amount of HOME-ARP allocated to non-rental housing eligible activities	\$	-	\$	-
Amount of HOME-ARP available for rental housing operations and reserves	\$	-	\$	-
Estimated amount for ongoing operating costs or operating cost assistance reserve	\$	-	\$	-
Amount of HOME-ARP available for rental housing development	\$	2,321,109.00	\$	2,321,109.00
Estimated amount from other housing development funding sources	\$	-	\$	18,000,000.00
Total amount available for rental housing development	\$	2,321,109.00	\$	20,321,109.00
Average per unit development cost for qualifying population	\$	192,000.00	\$	250,000.00
Estimated HOME-ARP Housing Production Goal		12		8:

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A preference permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A method of prioritization is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

"Prioritization. In the context of the coordinated entry process, HUD uses the term "Prioritization" to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section I.B.3. and Section I.D. of this Notice."

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.

Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Identify whether the PJ intends to give preference to one or more qualifying population or a subpopulation within one or more qualifying populations for any eligible activity or project:

The Consortium does not intend to give preference to any qualifying populations or any subpopulation within one or more qualifying populations for any eligible activity or project.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable

Referral Methods

The Consortium does not intend to implement referral methods for any eligible activity or project.

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.

PJs may limit admission to HOME-ARP rental housing or NCS to households who need
the specialized supportive services that are provided in such housing or NCS.
However, no otherwise eligible individuals with disabilities or families including an
individual with a disability who may benefit from the services provided may be excluded
on the grounds that they do not have a particular disability.

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The Consortium does not intend to limit eligibility for a HOME-ARP rental housing or NCS project.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not applicable

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under the PF will refinance existing debt for a HOME-ARP rental project, including:

• Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity

Not applicable

• Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualifying populations for the minimum compliance period can be demonstrated

Not applicable

• State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both

Not applicable

 Specify the required compliance period, whether it is the minimum 15 years or longer

Not applicable

 State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG

Not applicable

Other requirements in the PJ's guidelines, if applicable

Not applicable

The Consortium does not intend to use HOME-ARP funds to refinance any existing debt.

APPENDICES

Appendix 1a - Form SF-424

Appendix 1b - Form SF-424B

Appendix 1c - Form 424D

Appendix 1d - HOME-ARP Certifications

Appendix 2 - Town Hall Blue Breakout Group Report

Appendix 3 - Town Hall Red Breakout Group Report

Appendix 4 - Public Notices

Appendix 5 - Public Hearing Presentation

Appendix 6 - Public Comment